

IN THE DRAWINGS:

The attached sheet of drawings includes changes to FIG. 4. This sheet, which includes FIGS. 3, 4, and 7, replaces the previous drawing sheet, including FIGS. 3, 4, and 7.

REMARKS

Claims 1 through 84 are currently pending in the application.

This amendment is in response to the Office Action of March 20, 2006.

35 U.S.C. § 112 Claim Rejections

Claims 1, 22, and 64 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention.

Applicants have amended the claimed invention to particularly point out and distinctly claim the subject matter of the invention to comply with the provisions of 35 U.S.C. § 112. Therefore, presently amended Claims 1, 22, and 64 are allowable under the provisions of 35 U.S.C. § 112.

35 U.S.C. § 102 Anticipation Rejections

Anticipation Rejection Based on Doan (U.S. Patent Application No. 2005/0167798)

Claims 1, 11, 15, 19, 22, 32, 34, 36, 40 through 43, 57, 61 through 64, 74, 76, 78, 82 through 84 were rejected under 35 U.S.C. § 102(a) as being anticipated by Doan (U.S. Patent Application No. 2005/016,798). Applicants respectfully traverse this rejection, as hereinafter set forth.

Applicants assert that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Brothers v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Applicants assert that the Doan reference is not prior art under 35 U.S.C. § 102(a) to the claimed inventions of claims 1, 11, 15, 19, 22, 32, 34, 36, 40 through 43, 57, 61 through 64, 74, 76, 78, and 82 through 84 because the publication date of the Doan reference is August 4, 2005, whereas the filing date of the present application is March 6, 2004. Accordingly, under 35 U.S.C. § 102(a) the invention was not described in a printed publication in this country before

the invention thereof by the Applicants. Therefore, claims 1, 11, 15, 19, 22, 32, 34, 36, 40 through 43, 57, 61 through 64, 74, 76, 78, and 82 through 84 are allowable.

Anticipation Rejection Based on Fang (U.S. Patent Application No. 2003/0127717)

Claims 1, 2, 5 through 9, 12, 20 through 23, 26 through 30, 33, 41, 43, 44, 46, 49 through 53, 55, 62, 64, 65, 68 through 72, and 75 were rejected under 35 U.S.C. § 102(b) as being anticipated by Fang (U.S. Patent Application No. 2003/0127717). Applicants respectfully traverse this rejection, as hereinafter set forth.

Applicants assert that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Brothers v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

After carefully considering the cited prior art, the rejections, and the Examiner's comments, Applicants have amended the claimed invention to clearly distinguish over the cited prior art.

Applicants assert that the Fang reference does not and cannot anticipate the claimed inventions of presently amended independent claims 1, 22, 43, and 64 under 35 U.S.C. § 102 because the Fang reference does not identically describe, either expressly or inherently, each and every element of the claimed inventions in as complete detail as contained in the claims. Applicants assert that the Fang reference does not identically describe the elements of the claimed inventions of presently amended independent claims 1, 22, 43, and 64 calling for "the a semiconductor die having an active surface, an inactive surface, at least one circuit, and at least one bond pad formed on a portion of the active surface and connected to the at least one circuit, the at least one bond pad formed on a portion of the inactive surface of the semiconductor die for at least one of lowering stress of a portion of the semiconductor die, protecting a portion of the semiconductor die, lowering stress of a portion of the semiconductor die, and protecting a portion of the semiconductor die by placing the at least one bond pad on a portion of the inactive surface of the semiconductor die distributing the forces therearound", "forming an area of metal on a surface of the semiconductor die for one of decreasing stress acting on the surface of the

semiconductor die by placing at least one bond pad on an inactive surface of the semiconductor die distributing the forces therearound and protecting at least a portion of the semiconductor die”, and “performing at least one of lowering stress of a portion of the semiconductor die, protecting a portion of the semiconductor die, lowering stress of a portion of the semiconductor die by placing the at least one bond pad on a portion of the inactive surface of the semiconductor die distributing the forces therearound, and protecting a portion of the semiconductor die”.

Applicants assert that the Fang reference contains no description whatsoever of any such elements of the invention. Therefore, presently amended independent claims 1, 22, 43, and 64 are allowable as well as the dependent claims therefrom.

35 U.S.C. § 103(a) Obviousness Rejections

Obviousness Rejection Based on Fang (U.S. Patent Application No. 2003/0127717) and further in view of Doan (U.S. Patent Application No. 2005/0167798)

Claims 10, 13, 14, 31, 35, 54, 56, and 77 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Fang (U.S. Patent Application No. 2003/0127717) as applied to Claims 1, 22, 43, and 64 above, and further in view of Doan (U.S. Patent Application No. 2005/0167798). Applicants respectfully traverse this rejection, as hereinafter set forth.

Applicants assert that to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the cited prior art reference must teach or suggest all of the claim limitations. Furthermore, the suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on Applicants' disclosure.

Applicants assert that the Fang reference does not teach or suggest the claim limitations of “a semiconductor die further comprising: at least one resilient connector attached to a portion of the active surface of the semiconductor die and a portion of a surface of the substrate”.

Again, Applicants assert that the Doan reference is not prior art under 35 U.S.C. § 102(a) to the claimed inventions of claims 1, 22, 43, and 64 because the publication date of the Doan

reference is August 4, 2005, whereas the filing date of the present application is March 6, 2004. Accordingly, under 35 U.S.C. § 102(a) the invention was not described in a printed publication in this country before the invention thereof by the Applicants. Therefore, presently amended independent claims 1, 22, 43, and 64 are allowable as well as dependent claims 10, 13, 14, 31, 35, 54, 56, and 77 therefrom.

Obviousness Rejection Based on Fang (U.S. Patent Application No. 2003/0127717) and further in view of Chu et al. (U.S. Patent Application No. 2004/0099961)

Claims 3 through 4, 24 through 25, 47 through 48, and 66 through 67 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Fang (U.S. Patent Application No. 2003/0127717) as applied to Claims 1, 22, 43, and 64 above, in further in view of Chu et al. (U.S. Patent Application No. 2004/0099961). Applicants respectfully traverse this rejection, as hereinafter set forth.

Applicants assert that to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the cited prior art reference must teach or suggest all of the claim limitations. Furthermore, the suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on Applicants' disclosure.

Applicants assert that the Fang reference does not teach or suggest the claim limitation calling for "wherein the at least one bond pad formed on the portion of the inactive surface includes a bond pad having more than one layer of material".

Applicants assert that the Chu et al. reference is not prior art under 35 U.S.C. § 102 to the claimed inventions of presently amended independent claims 1, 22, 43, and 64 because the publication date of the Chu et al. reference is May 27, 2004, whereas the filing date of the present application is March 6, 2004. Accordingly, under 35 U.S.C. § 102(a) the invention was not described in a printed publication in this country before the invention thereof by the Applicants.

Therefore, the Chu et al. reference is not prior art to the claimed inventions of the present application.

Therefore, presently amended independent claims 1, 22, 43, and 64 are allowable as well as dependent claims 3 through 4, 24 through 25, 47 through 48, and 66 through 67 therefrom.

Obviousness Rejection Based on Doan (U.S. Patent Application No. 2005/0167798) and further in view of Chu et al. (U.S. Patent Application No. 2004/0099961)

Claims 66 and 73 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Doan (U.S. Patent Application No. 2005/0167798) as applied to Claim 64 above, and further in view of Chu et al. (U.S. Patent Application No. 2004/0099961). Applicants respectfully traverse this rejection, as hereinafter set forth.

Applicants assert that to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the cited prior art reference must teach or suggest all of the claim limitations. Furthermore, the suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on Applicants' disclosure.

Applicants assert the neither the Doan reference nor the Chu et al. reference is prior art under 35 U.S.C. § 102(a) to the claimed inventions of presently amended independent claims 1, 22, 43, and 64 because the publication date of the Doan reference is August 4, 2005 while the publication date of the Chu et al. reference is May 27, 2004, whereas the filing date of the present application is March 6, 2004. Accordingly, under 35 U.S.C. § 102 the invention was not described in a printed publication in this country before the invention thereof by the Applicants. Therefore, presently amended independent claim 64 is allowable as well as dependent claims 66 and 73 therefrom.

Obviousness Rejection Based on Doan (U.S. Patent Application No. 2005/0167798) and further in view of Kuo et al. (U.S. Patent Application No. 2005/0121804)

Claims 16 through 18, 37 through 39, 45, 58 through 60, and 79 through 81 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Doan (U.S. Patent Application No. 2005/0167798) as applied to Claims 1, 22, 43, and 64 above, and further in view of Kuo et al. (U.S. Patent Application No. 2005/0121804). Applicants respectfully traverse this rejection, as hereinafter set forth.

Applicants assert that to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the cited prior art reference must teach or suggest all of the claim limitations. Furthermore, the suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on Applicants' disclosure.

Applicants assert that Applicants assert the neither the Doan reference nor the Kuo et al. reference is prior art under 35 U.S.C. § 102(a) to the claimed inventions of presently amended independent claims 1, 22, 43, and 64 because the publication date of the Doan reference is August 4, 2005 while the publication date of the Kuo et al. reference is June 9, 2005, whereas the filing date of the present application is March 6, 2004. Accordingly, under 35 U.S.C. § 102 the invention was not described in a printed publication in this country before the invention thereof by the Applicants. Therefore, presently amended independent claims 1, 22, 43, and 64 are allowable as well as dependent claims 16 through 18, 37 through 39, 45, 58 through 60, and 79 through 81 therefrom.

Applicants submit that claims 1 through 84 are clearly allowable over the cited prior art.

Applicants request the allowance of claims 1 through 84 and the case passed for issue.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James R. Duzan". The signature is fluid and cursive, with a long, sweeping underline.

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Date: June 19, 2006
JRD/mah:lmh

Document in ProLaw

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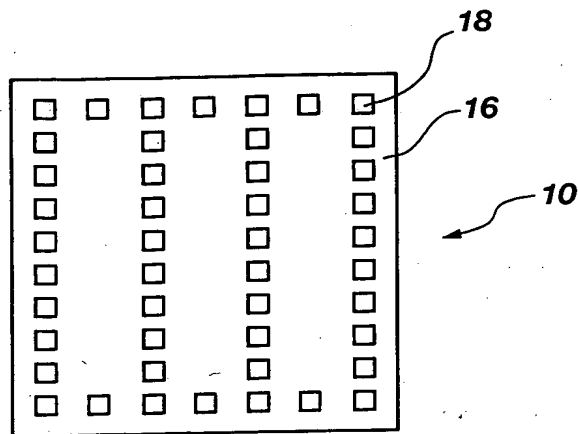


FIG. 3

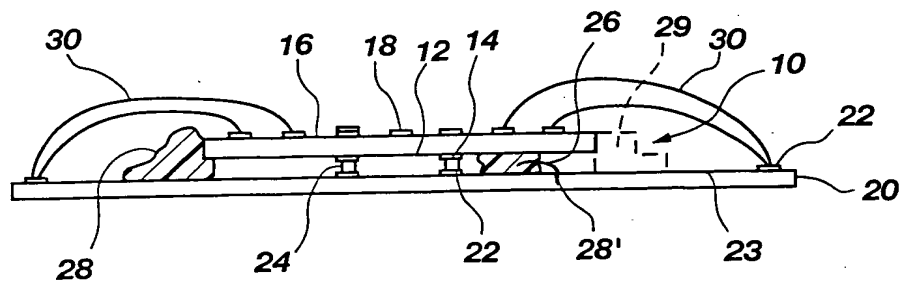


FIG. 4

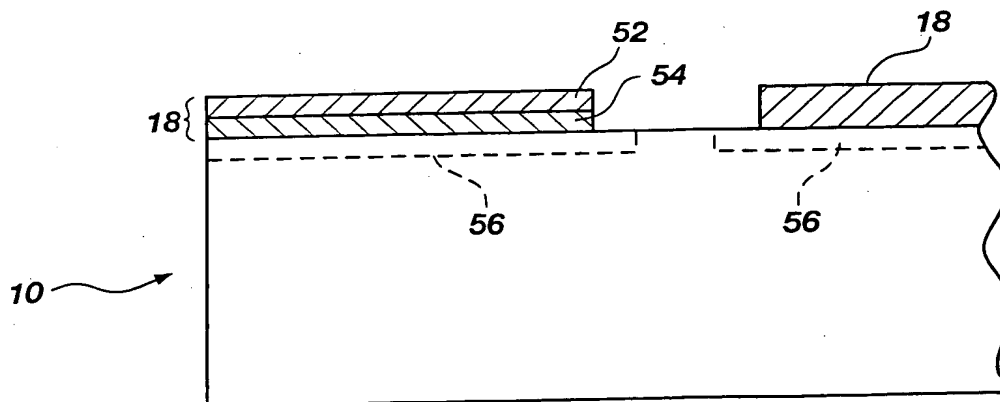


FIG. 7